

EXHIBIT 38

(Supplement)

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 - - - - -x

5 SERGEY LEONTIEV,

6 Plaintiff,

Case No. 16-cv-3595

7 -against-

8 ALEXANDER VARSHAVSKY,

9 Defendant.

10 - - - - -x

11 January 11, 2017

12 3:10 p.m.

13
14
15 Videotaped deposition of
16 ALEXANDER SHCHEGLYAEV, taken by Defendant,
17 pursuant to Notice, held at Hotel Kämp,
18 Pohjoisesplanadi 29, Helsinki, Finland,
19 before Sharon Lengel, a Registered
20 Professional Reporter, Certified Realtime
21 Reporter, and Notary Public of the State
22 of New York.

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24 * * *
25

A P P E A R A N C E S:

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ALSO PRESENT:

DAVID ROSS ELLIOTT, Videographer
PAVEL KHOKHLACHEV, Interpreter
VICTOR POTAPOV, Check Interpreter
VITALIY POPOV, ESQ.

* * *

1 SHCHEGLYAEV

2 to the companies of which you are the
3 beneficiary?

4 A. I'm just trying to remember,
5 just to explain the pause.

6 I don't think so. But I might
7 be mistaken.

8 Q. Do you know someone named Irina
9 Zubiy?

10 A. Yes.

11 Q. How do you know her?

12 A. About the same way as I know
13 Ms. Vyulkova. There were some corporate
14 events, some birthdays. For a certain
15 period of time, she tried to deal with
16 those companies, but I didn't quite
17 understand what came out of it.

18 Q. When you say, "For a period of
19 time, she tried to deal with those
20 companies," can you describe for us what
21 she did?

22 A. From the unconfirmed information
23 that I have, she contacted Trident
24 herself. And the emails that came from
25 Trident, that is, after February 2016, she